

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In Re TalentLaunch Data Breach Litigation

Case No. 1:24-cv-0456

Judge Pamela A. Barker

Magistrate Judge Jonathan D. Greenberg

**PLAINTIFFS' UNOPPOSED MOTION FOR
PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT**

Under Fed. R. Civ. P. 23(e), Plaintiffs James Christian, Steve Buyck, Charles Leland Perry, III, David Barker, and Amanda Lenz (collectively, "Plaintiffs"), individually and on behalf of all others similarly situated, hereby move this Court for Preliminary Approval of a proposed \$1,225,000 non-reversionary common fund class action settlement.

In support thereof, Plaintiffs rely upon the accompanying Memorandum in Support of their Motion for Preliminary Approval of Class Action Settlement; the Settlement Agreement ("S.A.") attached as **Exhibit 1**; the Declaration of Terence R. Coates in Support of Plaintiffs' Motion for Preliminary Approval of Class Action Settlement ("Coates Decl.") attached as **Exhibit 2**; the Declaration of Scott M. Fenwick of Kroll Settlement Administration, LLC, in Connection with Preliminary Approval of Settlement ("Kroll Decl.") attached as **Exhibit 3**; the records, pleadings, and papers filed in this action; and such other evidence or argument that may be presented to the Court.

A Proposed Order Granting Preliminary Approval to the Class Action Settlement is also attached as **Exhibit 4**.

Plaintiffs consulted with Defendant before filing this Motion and determined that this Motion is unopposed.

Dated: February 10, 2025

Respectfully submitted,

/s/ Terence R. Coates

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Counsel for Plaintiffs and the Putative Class

* Motion for Appearance *Pro Hac Vice* pending

CERTIFICATE OF SERVICE

I hereby certify that on February 10, 2025, I served the foregoing upon counsel for all parties by filing it with the Court's electronic-filing system in accordance with Fed. R. Civ. P. 5(b)(2)(E).

/s/ Terence R. Coates
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